

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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Classification and Fees
For Confirm

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. MC2002-1

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-7-11]

Pursuant to Order No. 1339, I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

Respectfully submitted,

May 29, 2002

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-7 In the supplemental response to DBP/USPS-6 you indicated that the Postal Service has only recently begun utilizing PLANET Code information on EXFC pieces. [a] Approximately what percentage of all EXFC pieces utilize a PLANET Code? [b] Please confirm, or explain if you are unable to do so, that the PLANET Codes are applied by Price Waterhouse. [c] Please confirm, or explain if you are unable to do so, that there is no initial scanning of the mailing of an EXFC mailpiece that utilizes a PLANET Code [i.e. the only input to the Confirm database will result from the scans of the individual mailpieces as they are read during the mail processing operation].

DBP/USPS-8 [a] Please confirm, or explain if you are unable to do so, that if an individual had access to the Confirm database and was aware of the PLANET Code that was utilized on an EXFC mailpiece, it would be possible to correlate that number with the corresponding POSTNET code and determine the address to which the EXFC mailpiece was addressed. [b] Please confirm, or explain if you are unable to do so, that

if certain employees of the Postal Service became aware of the address to which an EXFC mailpiece was addressed to, it could compromise the credibility of the EXFC program.

DBP/USPS-9 [a] Please provide a listing of those employees of the United States Postal Service who normally access or have the ability to access the Confirm database. [b] Please provide a listing of those employees of the United States Postal Service who normally have knowledge of or have the ability to have knowledge of the PLANET Codes utilized on EXFC mailpieces. [c] Please provide a listing of those employees of the United States Postal Service who normally access or have the ability to access the Confirm database to obtain the POSTNET Code that corresponds to a PLANET Code. The listing of employees provided in response to subparts a through c need not provide the name of the employee but only the number of employees, their title, and organization. The listings of organizations should indicate whether they are located at the USPS Headquarters in Washington or, if in the field, the location.

DBP/USPS-10 [a] Do any of the employees who are listed in response to DBP/USPS-9 have any part of their overall compensation affected by the results of the EXFC measurements? [b] If so, provide the names and titles of the employees and the full details of the effect of the EXFC measurements on their compensation.

DBP/USPS-11 [a] Please confirm, or explain if you are not able to do so, that the Chief Operating Officer and Executive Vice President and his subordinates [Area Vice Presidents, District Managers, Plant Managers, Postmasters, etc. and their subordinates] do not have access to the Confirm database. [b] Please advise the steps that are taken to ensure that the individuals listed in subpart a do not have access to the Confirm database.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

May 29, 2002

David B. Popkin